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April 28, 2025

VIA ECF

Magistrate Judge Steven Locke
100 Federal Plaza
Courtroom 820
Central Islip, NY 11722

Re: The Law Offices of Erica Yitzhak, et. al. v. Lambe, et. al.
Case No. 2:24-cv-03552

Dear Judge Locke:

We write on behalf of Respondent Paul Verner in response to Petitioner's letter motion (Doc. No. 30), dated April 25, 2025, seeking to compel Respondent to comply with Your Honor's September 16, 2024 Order.

Petitioner sent an email to Respondent on April 16, 2025 regarding Respondent's outstanding response to Petitioner's October 9, 2024 letter, in which Petitioner outlined specific discovery demands that Petitioner was seeking supplemental responses to. Before Respondent had an opportunity to speak with Petitioner regarding their April 16, 2025 email, Petitioner filed the instant letter motion.

As such, Respondent respectfully requests thirty (30) days to provide a supplemental response to the specific discovery demands outlined in Petitioner's October 9, 2024 letter.

We thank the Court for its time and consideration in this regard.

Respectfully yours,

/s/ Erin O'Leary

Erin O'Leary for
LEWIS BRISBOIS BISGAARD &
SMITH LLP